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REMARKS / DISCUSSION OF ISSUES

Claims 1-4 and 9-22 are pending in the application.

The Office action rejects claim 15 under 35 U.S.C. 102(b) over Kawashima et al. (USP 5,898,465, hereinafter Kawashima). The applicants respectfully traverse this rejection.

The Examiner's attention is requested to MPEP 2131, wherein it is stated:

"A claim is anticipated only if *each and every element* as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The *identical invention* must be shown in as *complete detail* as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Also, the Board of Patents Appeals and Interferences has consistently upheld the principle that the burden of establishing a prima facie case resides with the Office, and to meet this burden, the Examiner must specifically identify where each of the claimed elements are found in the prior art:

"there must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention. *Scripps Clinic & Research Found. v. Genentech, Inc.*, 927 F.2d 1565, 1576, 18 USPQ2d 1001, 1010 (Fed. Cir. 1991). To meet [the] burden of establishing a prima facie case of anticipation, the examiner must explain how the rejected claims are anticipated by pointing out *where* all of the specific limitations recited in the rejected claims are found in the prior art relied upon in the rejection." *Ex Parte Naoya Isoda*, Appeal No. 2005-2289, Application 10/064,508 (BPAI Opinion October 2005).

Claim 15 claims a projection television that includes a processor that displays a test pattern image, receives signals corresponding to the output of each of at least two optical sensors while the test pattern image is displayed, combines the signals to form an adjustment measure, and provides an adjustment measure to a deflection signal generator; wherein the deflection signal generator modifies a path of a projection based on the adjustment measure.

The Office action fails to identify where Kawashima teaches that the outputs from multiple sensors are combined to form an adjustment measure, and fails to identify where Kawashima teaches that a deflection signal generator modifies a path

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of a projection based on this adjustment measure. The Office action references elements in Kawashima's FIG. 11 as corresponding to the applicants' claimed elements, but fails to show where Kawashima teaches that each element performs the functions as claimed in claim 15. The applicants note that Kawashima's description of FIG. 11, at column 8, lines 20-45, refers to a dynamic adjusting of an intensity/density of a test pattern, and does not refer to combining signals, per se, and does not refer to modifying a projection path.

Because the Office action fails to show where Kawashima teaches each element of the applicants' claimed invention, the applicants respectfully maintain that the rejection of claim 15 under 35 U.S.C. 102(b) over Kawashima is unfounded, per MPEP 2131.

The Office action rejects claims 15-19 under 35 U.S.C. 102(e) over George (USP 6,606,130). The applicants respectfully traverse this rejection.

As noted above, claim 15, upon which claims 16-19 depend, claims a projection television that includes a processor that displays a test pattern image, receives signals corresponding to the output of each of at least two optical sensors while the test pattern image is displayed, combines the signals to form an adjustment measure, and provides an adjustment measure to a deflection signal generator; wherein the deflection signal generator modifies a path of a projection based on the adjustment measure.

George does not teach receiving signals corresponding to the output of each of at least two optical sensors while a single test pattern image is displayed, and does not teach combining such outputs to form an adjustment measure that is used to modify a path of a projection.

George teaches projecting a small block M to different areas of the display, and monitoring the output from a sensor while the block M is in the vicinity of the sensor. Claim 15 specifically claims monitoring the output from multiple sensors while the same test pattern image is being displayed.

In response to the applicants' prior remarks regarding George, the Office action states: "The examiner submits that nowhere does George disclose that when

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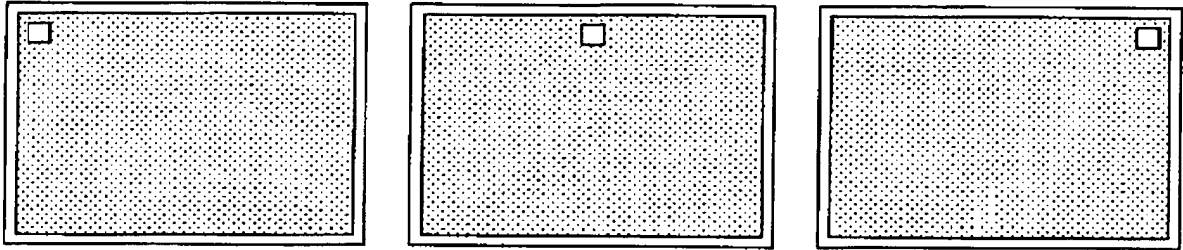
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Block M moves from one location to another the 'image' is changed." The applicants respectfully maintain that this statement is incorrect, because each movement of an object on a display screen will necessarily produce a different image.

The following illustrates a block being displayed at three different locations on a display screen:



The applicants respectfully maintain that there are three different images displayed above. One image shows a block on the left, the second image shows a block in the center, and the third image shows a block on the right. Each of these images differs, and thus cannot be said to be the same image.

As noted above, MPEP 2131 requires that the prior art teaches the identical invention, and the BPAI requires that the Examiner specifically identify where the prior art reference teaches each element of the claimed invention. The Office action fails to show where George teaches combining output signals when a test pattern is being displayed in an image to produce an adjustment measure, and fails to show where George teaches using such a combined measure to adjust a projection path.

Because the Office action fails to show where George teaches each element of the applicants' claimed invention, the applicants respectfully maintain that the rejection of claims 15-19 under 35 U.S.C. 102(e) over George is unfounded, per MPEP 2131.

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The Office action rejects claims 1 and 3 under 35 U.S.C. 103(a) over George. The applicants respectfully traverse this rejection.

The Examiner's attention is requested to MPEP 2142, wherein it is stated:

"To establish a *prima facie* case of obviousness ... the prior art reference (or references when combined) *must teach or suggest all the claim limitations*... If the examiner does not produce a *prima facie* case, the applicant is under no obligation to submit evidence of nonobviousness."

Each of claims 1 and 3 claims a method that includes displaying a test pattern consisting of a raster projection pattern image, receiving an output signal from each of at least two optical sensors located on opposing sides of a display screen while the raster projection pattern image is displayed, combining the output signals to form an adjustment measure, and adjusting the raster based on the adjustment measure.

As noted above, George does not teach or suggest receiving an output signal from each of at least two optical sensors while a raster projection pattern image is displayed. George teaches generating different images and receiving an output signal from the sensor being targeted by the test block M as the different images are produced.

The Office action fails to show where George teaches or suggests receiving an output signal from each of at least two optical sensors located on opposing sides of a display screen while a raster projection pattern image is displayed, fails to show where George teaches or suggests combining output signals from sensors to form an adjustment measure, and fails to show where George teaches or suggests adjusting the raster based on such a combined adjustment measure.

Because the Office action fails to identify where George teaches or suggests each of the applicants' claimed elements, the applicants respectfully maintain that the Office action fails to provide a *prima facie* case, and thus the rejection of claims 1 and 3 under 35 U.S.C. 103(a) over George is unfounded, per MPEP 2142.

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In view of the foregoing, the applicants respectfully request that the Examiner withdraw the objection(s) and/or rejection(s) of record, allow all the pending claims, and find the application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Robert M. McDermott
Reg. 41,508
Att'y for Applicant(s)

1824 Federal Farm Road
Montross, VA 22520
Phone: (804) 493-0707
Fax: (215) 243-7525